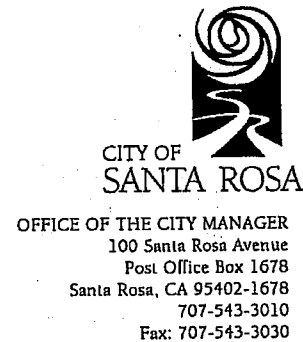


January 28, 2009

Lauren Clyde
Regional Water Quality Control Board
5550 Skylane Blvd., # A
Santa Rosa, CA 95403



Subject: Low Threat Discharge Basin Plan Amendment

Dear Ms. Clyde:

The proposed *Basin Plan Amendment to Establish Exception Criteria to the Point Source Waste Discharge Prohibitions by Revising the Action Plan for Storm Water Discharges and Adding a New Action Plan for Low Threat Discharges* (Low Threat BPA) is needed to address conflicts between regional and statewide permits and the Basin Plan prohibitions and to remove a difficult obstacle to the development of water recycling projects that would have a beneficial effect on water quality and aquatic life. The City of Santa Rosa commends Regional Water Board staff for its effort to bring this important policy matter to the Board for consideration and thanks the Board for making this possible.

The City of Santa Rosa owns and operates the Santa Rosa Subregional Water Reclamation System, which serves not only the City of Santa Rosa but also the cities of Rohnert Park, Cotati, and Sebastopol along with the South Park County Sanitation District. The Subregional System currently reuses 100 percent of the recycled water produced in a dry year and 95 percent of normal year production. In addition, the City intends to construct the Santa Rosa Urban Reuse Project (Project), which would provide 3,000 acre-feet per year of recycled water to about 1,000 existing and future landscape irrigation and commercial/industrial customers within Santa Rosa. The Project would offset use of potable supply, which is currently diverted from the Russian River, and would reduce the need to discharge recycled water to the Laguna de Santa Rosa. In 2007, the City Council unanimously approved the Project but directed that construction not begin until the Basin Plan is modified such that incidental runoff is no longer considered a violation of the seasonal discharge prohibition. Approval of the Low Threat BPA would eliminate this obstacle to Project construction.

The City of Santa Rosa supports the approval of the Low Threat BPA by the Regional Water Board. The remainder of this letter provides general comments to support and reinforce key staff analysis provided in the documents associated with the proposed Low Threat BPA. This letter also requests specific clarifications to the Low Threat BPA to further promote water recycling and compliance consistent with SWRCB and State legislature intent while providing increased beneficial uses protection.

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GENERAL COMMENTS

Page 6 of the staff report summarizes the need for the Low Threat BPA and provides a succinct explanation as to how and why protection of beneficial uses will be enhanced by the proposed Low Threat BPA:

"Prohibiting all low threat discharges is problematic because often no practical alternatives to the discharge are available, and because some activities that result in low threat discharges are vital to community development activities, such as construction and provision of reliable water supply (e.g., well development, and pipeline maintenance and repair). The prevalence of these community development activities, indicate that these discharges are occurring even with the prohibition in place. The Basin Plan allows for the possibility of providing exceptions to the point source discharge prohibitions. Section 4 states "... point source waste discharges, except as stipulated by the Thermal Plan, the Ocean Plan, and the action plans and policies contained in the Point Source Measures section of this Water Quality Control Plan (emphasis added) are prohibited ...". A higher degree of water quality protection can be achieved by acknowledging that these low threat discharges exist and providing a regulatory program that allows the discharges to occur under prescribed conditions. The proposed criteria that the discharge would have to meet to be eligible for consideration as low threat are contained in the proposed Amendment."

The City strongly agrees that conditions included in the proposed Low Threat BPA will reduce impacts of low threat discharges on waters of the State relative to the status quo (although we request a few important clarifications to those conditions in the Specific Comments section below). With respect to incidental runoff from irrigation in particular, the City has developed extensive legal authority and rigorous Best Management Practices (BMPs) for irrigation management in consultation with Regional Water Board and California Department of Public Health staff. These BMPs are summarized in Attachment A.

SPECIFIC COMMENTS

1. The proposed Low Threat Discharge Action Plan would impose the requirement that all such discharges "comply with applicable water quality objectives." The City supports the notion that, by definition, a low threat discharge must not adversely affect beneficial uses. The proposed language, however, is overly restrictive and ambiguous. It is overly restrictive in that a low volume, low threat discharge could contain a constituent at a concentration that exceeds a water quality objective but does not cause the objective to be exceeded in waters of the State. It is ambiguous in that some water quality objectives are expressed as an allowable receiving water quality change relative to ambient conditions (e.g., turbidity, temperature), which means that compliance cannot be assessed in the discharge alone. Based on these

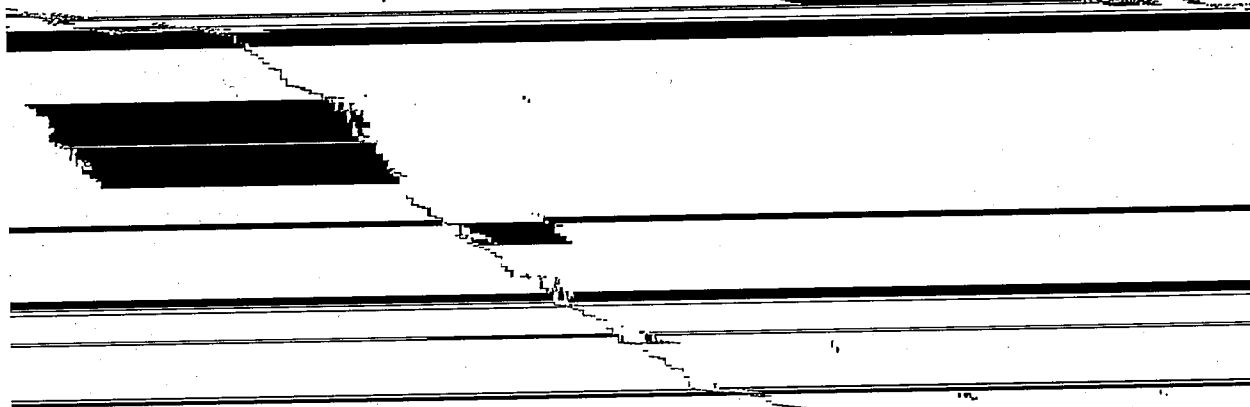
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considerations, the City proposes the following revision to page 3 of the proposed Low Threat Action Plan:

"2. The discharge shall not cause ~~comply with all~~ applicable water quality objectives to be exceeded."

2. Page 3 of the proposed revision to the Action Plan for Storm Water Discharges provides examples of incidental low-threat non-storm water discharge categories as including "incidental runoff of potable or recycled water from landscape irrigation due to an unexpected break in irrigation line or sprinkler head". For clarity and consistency with the SWRCB's draft proposed Water Recycling Policy (line 288 in January 16, 2009 draft that shows the changes from the previous draft), the City requests that the description of the example be expanded to address irrigation overspray as follows:

"... incidental runoff of potable or recycled water from landscape irrigation due to an unexpected break in irrigation line or sprinkler head or unintended

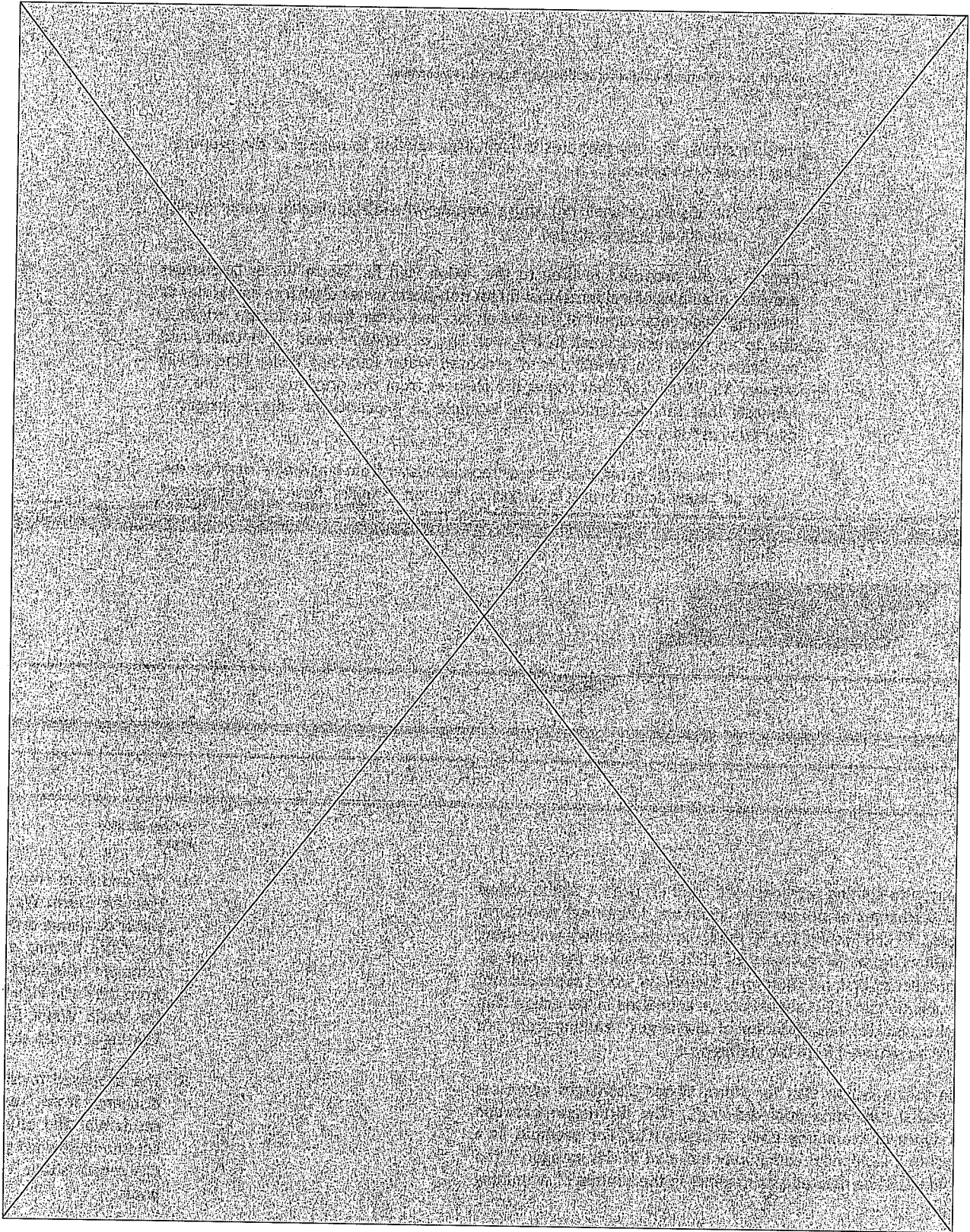


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ency fire-fighting activities" are cited on page 4 of the Action Plan for Storm Water Discharges as an example incidental low-threat non-storm water discharge category. 40 CFR Section 122.26 (b)(2) excludes discharges resulting from fire fighting activities from the category of illicit discharges that must be excluded from the storm sewer system. Therefore, such flows would seem exempt from prohibition and thus should not be addressed in the Action Plan for Storm Water Discharges. Likewise, mention of discharges resulting from fire fighting activities should be removed from the staff report.

In addition, the Action Plan for Storm Water Discharges addresses "incidental swimming pool draining". The distinction between different types of swimming pools is ambiguous. For example, is a swimming pool in a residential community included in this category? The word "residential" should be deleted as a qualifier in the context of swimming pools.

4. "[F]lows from emergency fire fighting activities" should be removed from the staff report and the Action Plan for Storm Water Discharges.
5. The proposed revision to the Action Plan for Storm Water Discharges addresses "residential swimming pool draining". The distinction between different types of swimming pools is ambiguous. For example, is a swimming pool in a residential community included in this category? The word "residential" should be deleted as a qualifier in the context of swimming pools.



ATTACHMENT A

Sections 1.8 through 1.14, 4.3.8 and 6.1.11 of the City's proposed Storm Water Management Plan (December 2007) summarize the City's legal authority and BMPs for irrigation management. These sections are provided below. The entire proposed Storm Water Management Plan is available at:

http://www.waterboards.ca.gov/northcoast/water_issues/hot_topics/santa_rosa_ms4_npdes_stormwater_permit/pdf/SWMP.pdf.

1.8 Standard Urban Storm Water Mitigation Plan (SUSMP)

In connection with the application for the first NPDES Storm Water Discharge Permit, the City adopted an ordinance revising the Santa Rosa City Code to successfully provide for enforcement of the Storm Water Permit requirements. These revisions provided a solid base for permit enforcement. In addition, after issuance of the second permit, the City legal counsel consulted with Regional Water Board legal counsel to determine whether further code revisions were needed in connection with the second permit incorporating the SUSMP. The City determined that legal authority does exist to implement SUSMP. In addition, the General Plan was reviewed and found to be in conformance with the water quality and watershed protection principles and policies stipulated by SUSMP.

1.9 Water Waste Ordinance and Related Statutes

The Santa Rosa City Code has several provisions addressing water waste, including prohibiting water waste, requiring repair or replacement of faulty equipment, and establishing the authority to terminate water service if water waste is occurring.

Chapter 14-21, Water Waste Regulations, adopted in 1999, and updated in 2007 to incorporate recycled water, prohibits water use that results in runoff, and prohibits breaks or leaks in the water delivery system. These City code provisions authorize the Director of Utilities to terminate water service for unresolved violations of the Water Waste Regulations.

Existing Santa Rosa City Code sections regarding Water Waste Regulations are set forth below:

Chapter 14-21 WATER WASTE REGULATIONS

14-21.010 Purpose. The purpose of this chapter is to promote the efficient use of potable or recycled water by prohibiting water uses which constitute water waste. The sections of this chapter encourage reasonable use of the potable or recycled water supply by eliminating all intentional or unintentional water waste

when a reasonable solution is available and discouraging use of equipment which is wasteful. (Ord. 3426 § 2 (part), 1999)

14-21.020 Water waste—Definition.

Water waste means:

- (A) Potable or recycled water use in outdoor areas resulting in runoff; or
- (B) Breaks or leaks in the potable or recycled water delivery system. (Ord. 3426 § 2 (part), 1999)

14-21.030 Prohibition of potable or recycled water waste. A customer shall not allow potable or recycled water waste. (Ord. 3426 § 2 (part), 1999)

14-21.050 Notice and disconnection. The Director of Utilities may issue a written warning to anyone who violates the provisions of this chapter. If a customer does not correct the violation within 15 days of notification, or such other time as specified by the Director, the City may disconnect potable or recycled water service. (Ord. 3426 § 2 (part), 1999)

Chapter 14-04 of the City Code includes the following sections which establish City authority to 1) require any customer to adjust, repair or replace any water equipment; and 2) terminate water service for waste or public health or safety reasons

14-04.065 Installation, ownership and maintenance of potable or recycled water service receiving equipment.

Consumers shall furnish, construct, install, own, operate, maintain and repair that portion of the potable or recycled water system on the consumer's premises which begin at the coupling on the consumer's side of the water meter. The City, as determined by the City Engineer, may require the consumer at his/her own expense to adjust, replace, repair, maintain or discontinue the use of any potable or recycled water receiving or regulating equipment on the consumer's side of the meter. (Ord. 2757 § 2, 1989 in part)

14-04.210 Disconnection—When.

Potable or recycled water service may be disconnected for the following reasons:

- (B) If the owner, occupant or consumer fails to comply with any of the regulations set out in this chapter, or any other rules and regulations of the Board of Public Utilities; or
- (C) For public health and/or safety reasons; or

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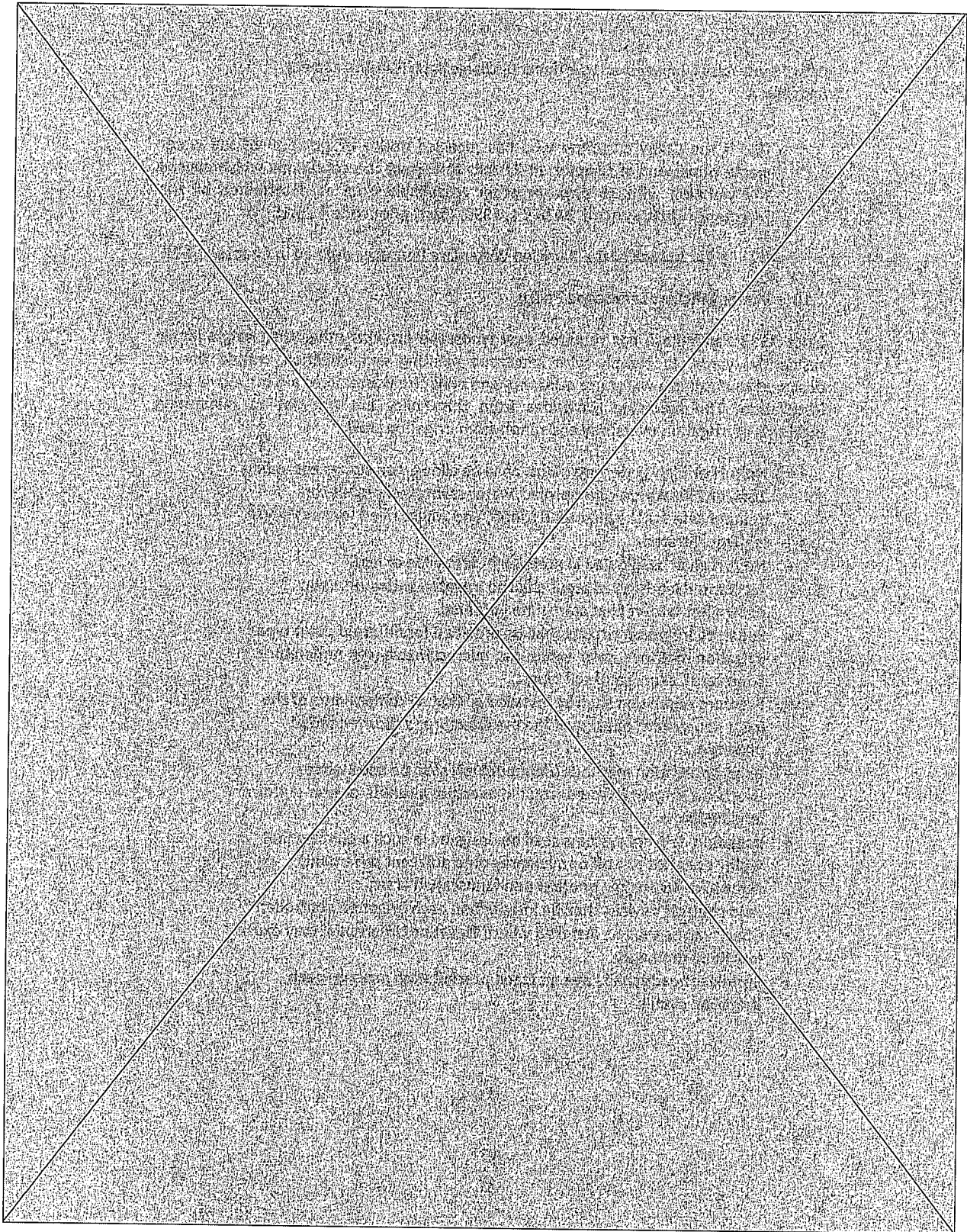
(E) If the utility customer who has received notice of violation of the water waste provisions of Chapter 14-21 fails to correct the conditions which caused the violation with 15 days, or other reasonable time as determined by the Director of Utilities. (Ord. 3426 § 1, 1999, (part) prior code § 25.15); or

(F) For breach of the Recycled Water Use Permit as defined in Chapter 14-25.

1.10 Water Efficient Landscape Policy

Since 1993 Santa Rosa has required new landscape projects other than single-family residential yards, to comply with landscape planting and irrigation criteria that is designed to maximize water use efficiency and minimize waste. Sites are inspected after installation. The following provisions from this Policy are relevant to minimizing incidents of irrigation overspray and runoff from irrigation sites:

- No turf or high-water-use plants shall be allowed on slopes exceeding 10%, or 25% where other project water saving techniques can compensate for the increased runoff, and where need for such slopes is demonstrated.
- No turf shall be allowed in areas eight feet wide or less.
- All planted landscaped areas shall be irrigated with automatic controllers with repeat start-time potential.
- Separate Irrigation circuits shall be provided for different plant types, irrigation methods, solar exposures, microclimates (e.g. understory, courtyard), slopes and soil types.
- Pressure regulation shall be installed so that all components of the irrigation system operate at the manufacturer's recommended pressure.
- Point application methods (drip, bubbler) shall be used where overhead irrigation would result in overspray, runoff, or non-uniform application.
- Irrigation delivery systems shall be designed in such a manner that water does not run off or overspray onto adjacent pavement, sidewalks, structures or other non-landscaped areas.
- Rain shut-off devices shall be installed on each irrigation controller.
- Check valves shall be installed where elevation differential may cause low head drainage.
- Sprinkler heads shall have matched precipitation rates on each irrigation circuit.



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The City of Santa Rosa is required under this Permit to have a User Agreement/ Permit with all end users of recycled water. The User Agreement/Permit binds the signatory user to all rules and regulations included in Attachment G, and the State of California Code of Regulations Title 22.

1.13 Recycled Water Ordinance/California Code of Regulations Title 22

The City of Santa Rosa is the owner and operator of the recycled water system serving the City Urban Growth Boundary with recycled water, and as such is governed by the California Code of Regulations Title 22 which sets forth criteria for the use of recycled water in California. In 2007, Santa Rosa adopted a Recycled Water Ordinance which modified City Code "Title 14 - Water" to extend many potable water provisions to recycled water, and to codify the rules, regulations and authorities of the Recycled Water System by introducing "Chapter 14-25 Recycled Water Regulations".

All recycled water users must have a Recycled Water User Permit with the City for the use of recycled water which includes requirements to abide by all rules and regulations of the City Code and Santa Rosa's Recycled Water User's Guide which sets forth the specific rules and regulations for the end user. Pursuant to these rules and regulations, each user site is inspected annually, new sites are inspected on installation, and regular contact with the City is required.

Sections from the Recycled Water Ordinance regarding use of recycled water are set forth below:

14-25.050 Recycled Water User's Guide

The City will at all times have a Recycled Water User's Guide which will be prepared, maintained and updated by the Director of Utilities, or his or her designee. The purpose of the Recycled Water User's Guide is to detail the requirements of the following rules and regulations as they apply to the City recycled water system: this chapter; the California Code of Regulations Title 22; other state and local rules and regulations related to the use of recycled water as they may be adopted or changed from time to time.

14-25.060 Recycled Water Use Permit

The City will issue to each recycled water customer a Recycled Water Use Permit for each site, which grants permission to use recycled water and requires the customer to use recycled water in accordance with the rules, regulations and standards of the Recycled Water User's Guide and all applicable state and local rules and regulations.

14-25.070 Designation of Site Supervisor

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Each customer will be required to designate a Site Supervisor for each site covered by a Recycled Water Use Permit. The Site Supervisor must serve as a liaison with the City, and must have the authority to carry out the requirements of the Recycled Water User's Guide and Recycled Water Use Permit, including the operations and maintenance of the on-site recycled water system and prevention of potential hazards.

14-25.080 Operation and maintenance of customer equipment

Each customer will be required to operate and maintain the on-site recycled water system in accordance with the Recycled Water User's Guide and Recycled Water Use Permit.

Notwithstanding compliance with this section, the City reserves the right to take any action necessary with respect to the operation of the customer's recycled water system to safeguard public health.

14-16.100 Entry upon customer's premises.

As a condition of recycled water service for new customers and as a condition of continued recycled water service for existing customers, the customer will permit the City to enter upon the customer's property during the City's normal working hours, or in case of emergency at any time, to inspect the customer's on-site recycled water system for compliance with the provisions of this chapter.

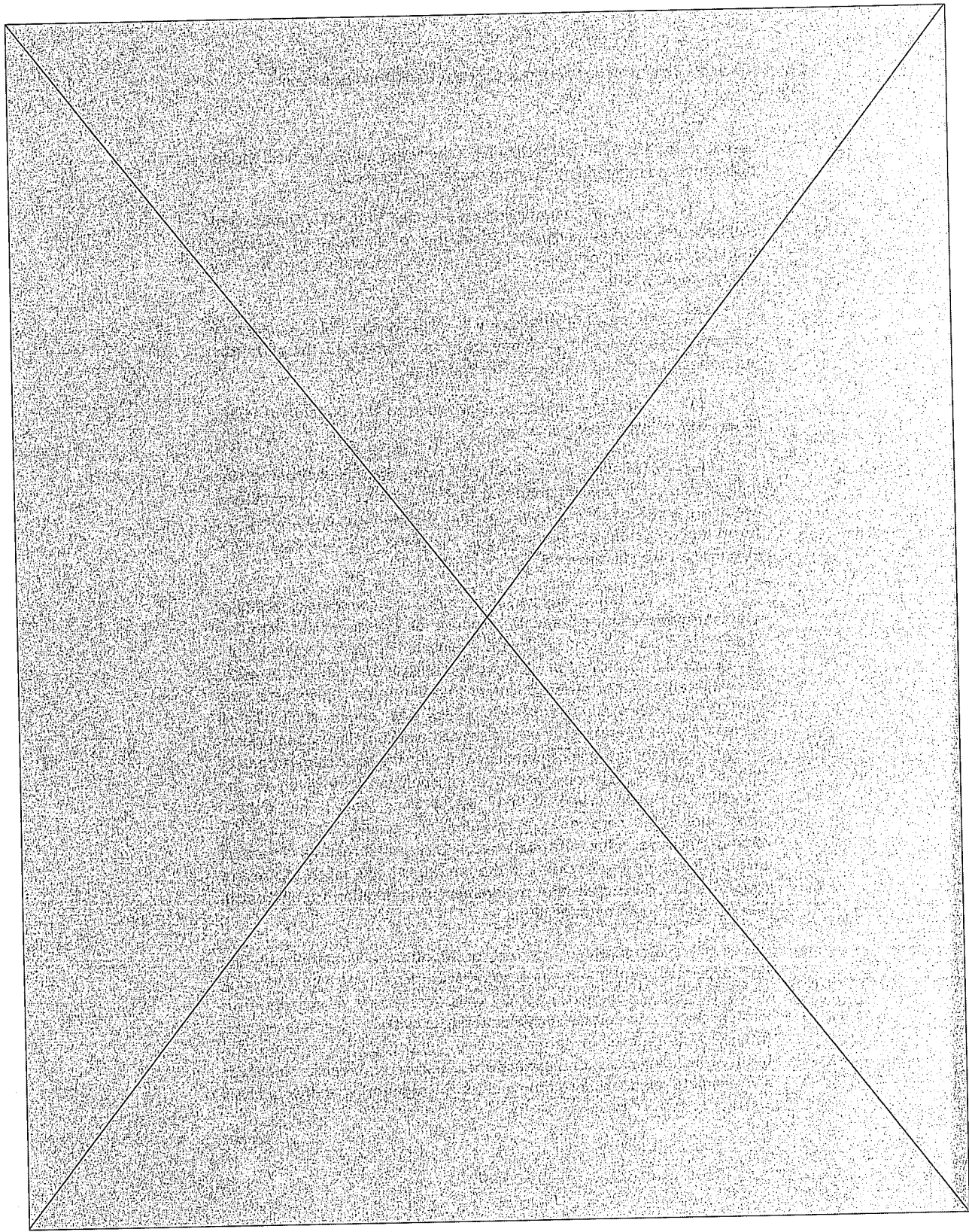
14-25.110 Enforcement of recycled water use rules and regulations

The Director of Utilities may immediately terminate recycled water service to any customer who violates the provisions of this chapter.

In the alternative, the Director of Utilities may issue a written warning to anyone who violates the provisions of this chapter. If a customer does not correct the violation within 15 days of notification, or such other time as specified, the Director of Utilities may terminate recycled water service without further notice. (Ord 3845§ 8, 2007 in part)

1.14 Enforcement

City Code Chapter 1-24 Citation Procedure provides the procedural sequence if a person is arrested for violation of the Santa Rosa City Code or other City ordinance. The Santa Rosa Police Department provides enforcement for City Code violations as well as for environmental crimes. In the event a citation is issued, the case is referred to the City Attorney for disposition. Violation of the Santa Rosa City Code can be prosecuted as infractions or misdemeanors per the discretion of the City Attorney. The sections are listed below.



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response for a commercial facility have the responsibility to train facility personnel and maintain notification procedures to assure:

(1) Immediate notification is provided to the City Department of Public Works of any suspected, confirmed or unconfirmed release of material, pollutants or waste creating a risk of discharge into the City storm water system;

(2) Immediate notification is given to the "911" emergency response system if said discharge poses an immediate threat to the public health or safety and/or the environment;

(3) Written notification is provided to the Director of Public Works within five working days.

(a) Training of personnel shall assure that all BMPs are being fully and correctly implemented and that all releases of any non-storm water discharge or of any pollutant that threatens to enter the City's storm water system are immediately recognized and that appropriate response is taken in the event of such release.

(b) As soon as any person in charge of a commercial facility or who is responsible for emergency response for a commercial facility has knowledge of, or reasonably could be expected to have knowledge of, any suspected, confirmed or unconfirmed release of a non-storm water discharge entering, or of any pollutant that is threatening to enter, the City storm water system from such facility, such person shall take all necessary steps to ensure the early discovery and containment and clean-up such release and shall immediately notify the City Department of Public Works. In addition, written notification shall be given to the Director of Public Works within five working days. This written notification shall contain as a minimum a narrative describing the circumstances resulting in the release, or threatened release, the effort taken to clean-up the release and the measures being taken to prevent reoccurrence. This notification requirement is in addition to, and not in lieu of, other required notifications.

(D) **Requirement to Test or Monitor.** Any authorized City employee may require that any person engaged in any activity or owning or operating any commercial facility which may cause or contribute to illicit discharges, undertake such monitoring activities and/or analysis and furnish such reports as the authorized employee may specify. The burden, including costs, of these activities, analysis and reports shall bear a reasonable relationship to the need for the monitoring and/or analysis

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and reports and the benefits to be obtained. The recipient of such a requirement shall undertake and provide the monitoring, analysis and reports required.

(E) Order to Cease and Desist. When the Director of Public Works finds that the discharge from a commercial facility is taking place, or is threatening to take place, in violation of the prohibitions of this article or any other discharge control requirements, the Director of Public Works may issue a written order to cease and desist and may direct the discharger to:

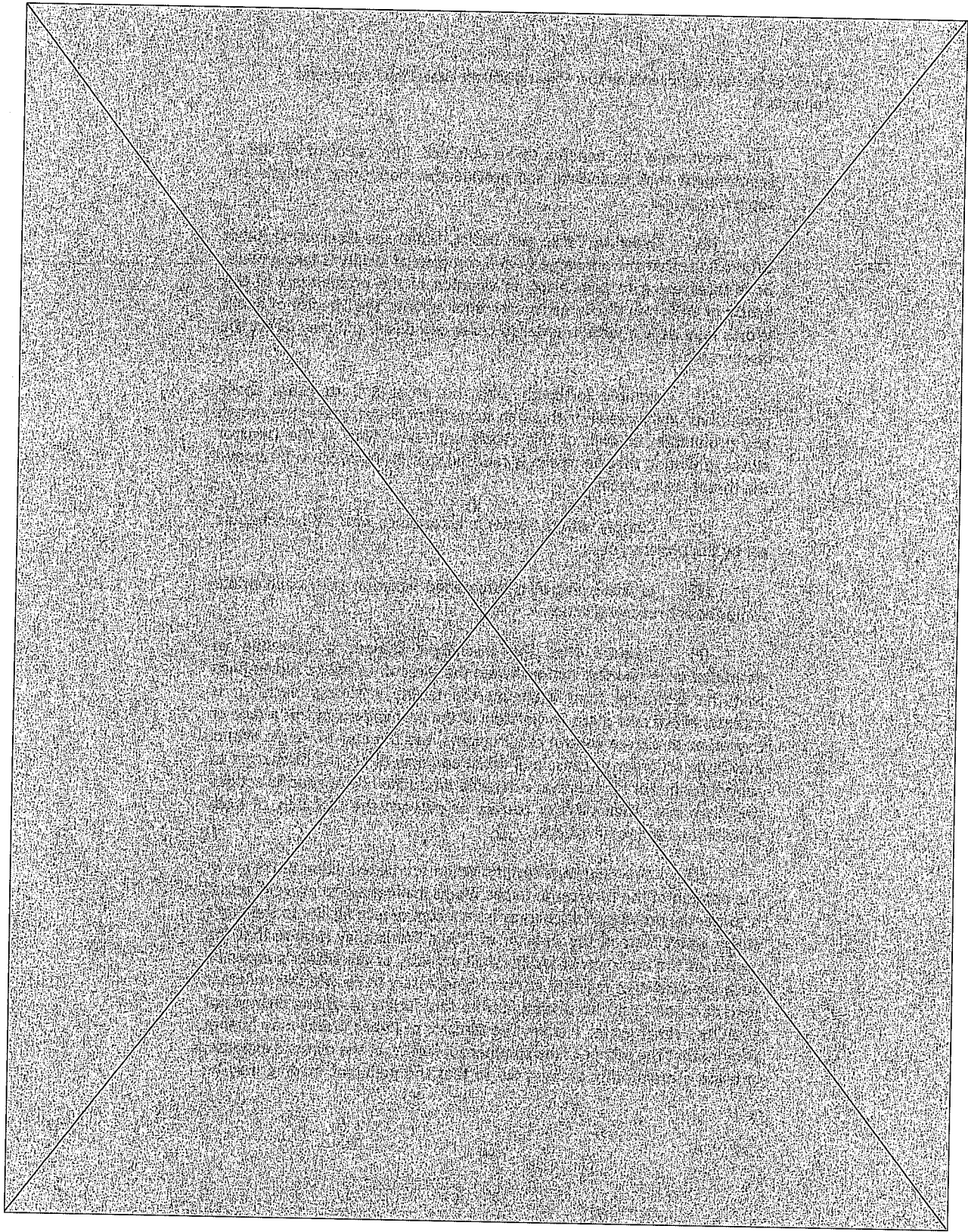
(1) Comply forthwith with the order and to cease those operations which result or threaten to result in discharges which violate any prohibition or limit of this article until such time as the Director states in writing that he or she is satisfied that BMPs which will remove the threat are in place;

(2) Comply with the order in accordance with a time schedule set by the Director; or

(3) In the event of a threatened violation take appropriate remedial or preventive action.

(F) Require that the Discharger Submit a Schedule of Remedial or Preventive Action. When the Director of Public Works finds that the discharge from a commercial facility is taking place, or is threatening to take place, in violation of the prohibitions of this article or any other discharge control requirements, the Director of Public Works may issue an order to cease and desist and may direct the discharger to submit for her or his approval a detailed time schedule of specific actions the discharger shall take to correct or prevent the violation of such prohibitions and requirements.

(G) Pre-discharge Facility. When source reduction BMPs are in the opinion of the Director of Public Works inadequate to prevent actual or potential prohibited discharges from a commercial facility to the City's storm water system, the Director of Public Works may require that the owner of the commercial facility shall provide, at the owner's expense, such pre-discharge facilities as may be necessary to reduce the pollutant load at a point prior to discharge from said facility or to any element of the City's storm water system. The Director of Public Works may further require that the owner of the commercial facility, at the owner's expense, provide a monitoring access hole so that the pollutant loading may be



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Section 17.12.220 Fine for falsification of data.

Any person who submits a report required by this article, which she or he knows, or should have reason to know, contains falsified data shall be subject to a fine not to exceed the amount that the City may be fined by the State Water Resources Control Board or the amount of any civil liability imposed on the City for noncompliance with the municipal storm water discharge permit for the Santa Rosa area. (Ord. 3272 § 1 (part)),

Section 17.12.230 Continuing violation.

Every day or any portion thereof any violation of this article continues shall constitute a separate offense. (Ord. 3272 § 1 1996 (part)),

Section 17.12.240 Concealment.

Concealing, aiding, or abetting a violation of any provision of this article shall constitute a violation of such provision. (Ord. 3272 § 1 (part)),

Section 17.12.250 Acts potentially resulting in violation of Federal Clean Water Act and/or Porter-Cologne Act.

Any person who violates any provision of this article or who violates any cease and desist order or prohibition may also be in violation of the Federal Clean Water Act and/or the Porter-Cologne Act and may be subject to the sanction of those acts including civil and criminal penalties. Any enforcement actions authorized under this article may also include notice to the violator of such potential liability. (Ord. 3272 § 1 (part)),

Section 17.12.260 Violations deemed a public nuisance.

In addition to the penalties provided herein, the City Council finds and determines that any condition caused or permitted to exist in violation of any of the provisions of this article is a threat to the public health, safety and welfare, is declared to be a nuisance and may be abated as such. (Ord. 3272 § 1 (part)),

Section 17.12.270 Civil actions.

In addition to any other remedies provided in this article, any violation of this article may be enforced by civil action brought by the City. In any such action, the City may seek, as appropriate, any or all of the following:

- (A) A temporary restraining order, preliminary and permanent injunction;

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(B) Reimbursement for the costs of any investigation, inspection, or monitoring survey which led to the establishment of the violation, and for the reasonable costs of preparing and bringing administrative action under this article;

(C) Costs incurred in removing, correcting, or terminating the adverse effect resulting from the violation;

(D) Compensatory damages for loss or destruction of water quality, wildlife, fish and aquatic life.

Costs and damages recovered under this section shall be paid to the City and shall be used exclusively for costs associated with monitoring and establishing storm water discharge pollution control system(s) and implementing or enforcing the provisions of this article. (Ord. 3272 § 1 (part)),

Section 17.12.280 Remedies not exclusive.

The remedies identified in this article are in addition to and do not supersede or limit any and all other remedies, civil or criminal. The remedies provided in this article shall be cumulative and not exclusive. (Ord. 3272 § 1 (part)),

Section 17.12.290 Dispute--Request for ruling.

If any discharger disputes an interpretation or application of this article, the discharger may request in writing a ruling by the Director of Public Works on the matter. The Director will set forth his or her determination(s) in writing. (Ord. 3272 § 1 (part)),

Section 17.12.300 Appeals.

If the discharger is dissatisfied with the determinations made by the Director of Public Works under Section 17-12.290, the discharger may, within 30 days after receipt of the ruling by the Director of Public Works, appeal the ruling to the City Council by filing a written notice of appeal with the City Clerk. The notice shall state each basis and the grounds for the appeal. The Council shall make a final determination of the issue(s) so submitted. (Ord. 3272 § 1 (part)).

4.3.8 Procedures to Minimize Incidental Runoff

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The following standard procedures are followed by City staff to minimize incidental runoff from a number of possible sources including:

Irrigation:

- Compliance with Citywide water conservation program, Water Waste Ordinance, Recycled Water Ordinance, Water Efficient Landscape Policy, and Recycled Water User's Guide.
- Automatic irrigation systems are programmed using California Irrigation Management Information System (CIMIS) information. This programming includes use of repeat cycles further reducing runoff. Water is applied in a manner that encourages deep rooting of turf-grasses.
- Irrigation systems in landscaped areas are designed to apply water where needed (at the plant) via bubbler systems rather than spray systems.
- Citizens and City staff report irrigation breaks or malfunctions to the Recreation and Parks Department office. Professional Irrigation Crew staff responds immediately and either turns off the irrigation system or repair the problem on site.

Summer discharges from nuisance flows:

- During storm drain cleaning operations, the Public Works Department Field Services Division cleaning crew will monitor summertime flows in the storm drain sections being maintained to assist in identifying excessive summertime flows or non-storm water discharges. Findings will be reported to the Public Works Department Storm Water Section for investigation and follow-up. The Public Works Department, Storm Water Section will track reported locations to determine whether any trends exist.
- Creek Steward volunteers will be asked to report locations of outfalls that they observe with summer flow to the Creek Stewardship Coordinator.
- The Utilities Department, Environmental Compliance Section inspectors will be asked to report locations with summer flows to Public Works Department, Storm Water Section.



r system. Waterlines also need to be
is, or pipe replacements for water
s are constructed during the summer
be restricted to the rainy season.

e flushing for new construction into
:
n no chlorine residual

ensure the quality of water in the drinking water
flushed after repairs, new construction, tie-in
quality and health reasons. Since most project
months, this type of water line flushing can not

- Current City standards that apply to water line
storm drains or other inland waterways include:
 - Water to be disposed of must contain

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year to protect public health and safety. Fire flow flushing is conducted to verify fire protection capacity when development and project applications are evaluated. This flushing needs to be conducted in a timely manner so that project processing can proceed with appropriate fire protection requirements. Water quality flushing of dead end mains needs to be conducted on a regular schedule throughout the year to ensure the quality of water in the drinking water system. Waterlines also need to be flushed after repairs, new construction, tie-ins, or pipe replacements for water quality and health reasons. Since most projects are constructed during the summer months, this type of water line flushing can not be restricted to the rainy season.

- Current City standards that apply to water line flushing for new construction into storm drains or other inland waterways include:
 - Water to be disposed of must contain no chlorine residual
 - pH must be between 6.5 and 7.5
 - The Regional Water Board must be notified in advance of the discharge.
- If discharges do not meet the preceding standards, the following is required:
 - Contractor must obtain permission from the Utilities Department, Environmental Compliance Section prior to the discharge being disposed of in the sanitary sewer system. (Payment of any fees required will be the responsibility of the contractor.)
 - pH must be between 6.0 and 9.5

Reservoir Draining:

Before any water tank reservoirs are taken out of service and drained, special precautions need to be taken as detailed below:

- A water discharge plan needs to be in place prior to any discharge.
- Notification of the following:
 - Fire protection agencies
 - Utilities Department, Environmental Compliance Section for discharge permit issues.
 - Public Works Department, Storm Water Section spill response staff for any storm water discharge response issues.
 - Utilities Department, Water Quality Division for possible low-pressure complaints and for sampling.
 - North Coast Regional Water Quality Control Board

If a specific area is determined to need advance warning, residences should be door tagged 48 hours prior to flushing.

Securing Reservoir:

A plan of action, duties, responsible persons, time lines, materials, equipment and contingency plans must all be made well in advance of the isolation and be discussed with all parties involved.

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- Make prior arrangements with Regional Water Board staff to discuss discharge plan.
- Notify proper managers/co-workers
- Allow demand to draw down reservoir to minimize water loss
- Use pumper, if possible, to pump remainder of water into system.

Draining Plan:

Prior to each discharge, downstream impacts must be evaluated and efforts made to minimize any possible impacts to the maximum extent possible. Plan must describe:

- Reason for discharge
- Location of reservoir site
- Site map
- Water quality data.
- Anticipated discharge (flow and quantity) as well as duration.
- Notify residents that are in the proximity of water ways that may see a flow increase.
- Address any public concerns that may arise
- Inspect and clear all storm drains, drainage channels for possible blockages.
- Inspect for possible erosion and sediment issues. Specify appropriate BMPs to protect channel as appropriate.
- Inspect possible sources of contamination in storm drains, drainage channels, i.e., oil cans, hazardous waste, garbage, etc.
- Notify Public Works, Storm Water Section so they may be able to make any further recommendations.

Water Quality:

Once the drainage path is clear and protected, tank discharge water must be dechlorinated before the draining process can begin:

- Chlorine residual in the system is less than 2.0 mg/L, typically averaging between 0.2 mg/L and 0.8 mg/L. Check for residual levels to determine dechlorination process.
- Follow manufacturer instructions for de-chlorinating reagent dosing rates.
 - Granular reagents are more effective when made into a solution by mixing with water before applying.
 - Ascorbic acid, a natural material, (Vitamin C) is relatively safe and preferred over other reagents.
- After distributing the reagent through roof hatch and vents, monitor chlorine residual levels. A pocket colorimeter (Hach Company) may be used to measure residual chlorine concentration in the water. Chlorine residual must be non-detectable to proceed with discharge.

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- In conjunction with adding the reagent to the interior of the reservoir, as additional precaution a perforated container of ascorbic acid tablets will be placed at the first point possible after the water has left the reservoir.
 - Ponding can be used to aid in detention time, as well as distributing de-chlorinating reagent by hand.

Once there is a non-detectable residual:

- Slowly begin to drain reservoir at a rate that will not be an impact to surrounding environment.
- Inspect effluent flow and adjust accordingly so as not to raise turbidity levels within channel flow. Flushing at high velocities can cause soil erosion, vegetation damages and drainage problems, if necessary use hay bales or other manufactured devices to aid with flow. Appropriate BMPs are required to avoid any type of detrimental impact to channels.
- Monitor outfall
- Continue water quality testing throughout the process.
- Keep the Public Works Department, Storm Water Section and the Regional Water Board informed of progress and advise them of completion of work.

Measurable Goals:

- Continue to implement existing procedures and activities.
- In Year 1, develop tracking system for reported locations of incidental runoff.
- In Year 1, dechlorination procedures and measures to manage/reduce flow volume and volume and velocity impacts on downstream waterways will be drafted and submitted for Regional Water Board review. Final procedures and protective

events, through the residential developers with new homeowner packets, and through new utility account welcome packets. For users of recycled water, the Recycled Water User's Guide is Incorporated by reference into each user agreement and distributed to each user.

Since January 2007, Santa Rosa's water rate structure has included higher charges for landscape watering above a prudent level. The Utilities Department, Water Conservation staff perform Individual Irrigation audits on request to instruct homeowners on proper irrigation practices and plant selection to minimize water overspray and runoff.

Measurable Goals:

- Materials distribution, new utility account welcome packet numbers, number of self-inspections for recycled water customers, workshop attendance numbers, and site inspection numbers will be included in each Annual Report.

City of Santa Rosa Comments on Low Threat Discharge Basin Plan Amendment
Appendix A

soils are exposed. The Water Conservation Program and the Storm Water Program offer a series of workshops each spring and fall about proper plant selection and irrigation practices. Materials are distributed at City facilities, through participation in public events, through the residential developers with new homeowner packets, and through new utility account welcome packets. For users of recycled water, the Recycled Water User's Guide is incorporated by reference into each user agreement and distributed to each user.

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